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Donald J. Trump and Trump Organization LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

DONALD J. TRUMP and TRUMP
ORGANIZATION LLC,

Plaintiffs,

v.

LETITIA JAMES, in her official capacity as
Attorney General for the State of New York,

Defendant.

Civil Action No.: 1:21-cv-01352-BKS-CFH

**DECLARATION OF ALINA HABBA, ESQ. IN
SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

I, Alina Habba, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am managing partner of the firm of Habba Madaio & Associates LLP, counsel for Donald J. Trump and Trump Organization LLC (collectively, "Plaintiffs") in the above-captioned matter (the "Action").

2. I submit this declaration pursuant to Federal Rule of Civil Procedure 65 and Local Rule 7.1, in support of Plaintiffs' Motion for Preliminary Injunction. The facts herein are true and correct and, unless otherwise stated, are within my personal knowledge.

3. As counsel for Plaintiffs, I have reviewed pleadings, and other documents related to the Action, and I am familiar with the facts and circumstances of this case.

4. Attached hereto as **Exhibit A** is a true and accurate copy of the original Complaint filed with this Court on December 20, 2021.


5. For the reasons set forth more fully in the Complaint, Plaintiffs will suffer immediate and irreparable injury unless this Court grants an Order staying the Office of the New York Attorney General's active civil investigation of Plaintiffs for the duration of this action and pending resolution thereof, or, in the alternative, requiring that Defendant recuse herself from involvement in any capacity in the active civil investigation of Plaintiffs for the duration of this action and pending resolution thereof.

6. Since 2019, the defendant, Letitia James ("Defendant"), Attorney General of the State of New York, has conducted a civil investigation of Plaintiffs. Most recently, Defendant has also become involved in a concurrent criminal investigation of Plaintiffs. As part of both investigations, which are still open and pending to date, Defendant has served multiple subpoenas on plaintiff, Donald J. Trump, as well as on his family members and officers of plaintiff, Trump Organization LLC. Over the course of the past almost three (3) years, Plaintiffs have produced numerous pages of documents and furnished testimony from numerous witnesses.

7. Plaintiffs have filed the instant application for injunctive relief because, as set forth in the memorandum of law accompanying Plaintiffs' motion, the continuation of the current investigations and proceedings against Plaintiffs will interfere with this Court's adjudication of Plaintiffs' First Amendment and Equal Protection claims.

Dated: January 10, 2022,

Respectfully submitted,

By: 
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